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June 8, 2020

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Sheldon Silver, 15 Cr. 093 (VEC)

Dear Judge Caproni:

We respectfully submit this letter to request a short adjournment of the parties' sentencing submissions, currently due on June 11, 2020. The government joins this motion. Sentencing is scheduled for July, 25, 2020.

This afternoon, the United States Probation Department advised the parties that it intends to submit an update to the Presentence Report ("PSR"). The defendant will need one-week to review and incorporate the updated PSR into his sentencing submission. In addition, as the Court is aware, the parties are engaged in ongoing and constructive discussions regarding the amount of money and gain involved in the counts of conviction for forfeiture purposes. These issues are also relevant to the sentencing submissions. We expect to conclude the discussions with the government soon. If the parties reach agreement, it would streamline both the update to the PSR and the sentencing submissions. Accordingly, the parties jointly request the Court grant a brief adjournment of the filing date for the sentencing submissions to one-week from the date Probation submits the updated PSR.

Respectfully submitted,

/s/ James P. Loonam
James P. Loonam
Meir Feder
Colleen Noonan Ryan
Abigael Bosch

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cc: Counsel of record (via ECF)